

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88  
ECF Case

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**This document relates to the following case:**

*City of New York v. Amerada Hess Corp., et al.*  
Case No. 04 Civ. 3417

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**DECLARATION OF MARNIE E. RIDDLE IN SUPPORT OF PLAINTIFF CITY OF  
NEW YORK'S MOTION *IN LIMINE* NO. 3 TO EXCLUDE EXPERT TESTIMONY  
CONSISTING OF LEGAL CONCLUSIONS, INTERPRETING THE LAW, OR  
REGARDING LEGISLATIVE OR AGENCY MOTIVE OR INTENT**

Marnie E. Riddle, an attorney duly admitted to appear in this case, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of Sher Leff LLP, counsel for Plaintiff City of New York ("the City") in the above-captioned matter. I submit this Declaration in support of Plaintiff City of New York's Motion in Limine No. 3 to Exclude Expert Testimony Consisting of Legal Conclusions, Interpreting the Law, or Regarding Legislative or Agency Motive or Intent (hereinafter "Motion"). This Declaration authenticates the exhibits attached hereto and relied on in the City's Motion. In accordance with this Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 11, 2009.

2. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Anthony Taverni, dated January 23, 2009, submitted in the above-captioned case.

3. Attached as Exhibit 2 is a true and correct copy of selected pages from the Transcript of the Deposition of Anthony Taverni in the above-captioned case, dated March 18, 2009.

4. Attached as Exhibit 3 is a true and correct copy of selected pages from the Expert Report of Marcia E. Williams, dated January 22, 2009, submitted in the above-captioned case.

5. Attached as Exhibit 4 is a true and correct copy of selected pages from the Expert Report of Richard D. Wilson, dated January 16, 2009, submitted in the above-captioned case.

6. Attached as Exhibit 5 is a true and correct copy of selected pages from the Expert Report of Thomas C. Austin, dated January 23, 2009, submitted in the above-captioned case.

7. Attached as Exhibit 6 is a true and correct copy of selected pages from the Transcript of Deposition of Robert N. Stavins in the above-captioned case, dated November 27, 2007.

8. Attached as Exhibit 7 is a true and correct copy of selected pages from the Expert Report of Robert N. Stavins, dated January 23, 2009, submitted in the above-captioned case.

On this 11th day of May 2009, I hereby declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: San Francisco, CA  
May 11, 2009

/s/ MARNIE E. RIDDLE

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